Cal/EPA Environmental Justice Action Plan

Pilot Project Proposal Summary for Illegal Drug Lab Risk Reduction Project

January 14, 2005

- I. Lead Agency: Department of Toxic Substances Control (DTSC)
- **II. Area Proposed:** A community of within one of the following cities: Antioch, Hayward, Oakland, Oakley or San Jose in Contra Costa County.

Area Demographics:

Antioch

65% white; 10% African-American; 22% Latino; 32% under the age of 18; Median household income: \$65,000; below poverty level: 8.5%

Hayward

43% white; 11% African-American; 19% Asian; 34.2% Latino; 25% under the age of 18; Median household income: \$51,000; Below poverty level: 7.2%

Oakland

31% white; 36% African-American; 15% Asian; 22% Latino; 25% under the age of 18; Median household income \$44,000; below poverty level: 19% Oakley

75% white; 3.4% African-American; 2.9% Asian; 25% Latino; 25% under the age of 18; Median household income \$69,000; below poverty level: 5.0.4%; San Jose

47% white; 3.5% African-American; 30% Latino; 26% Asian; 26% under the age of 18; Median household income \$70,000; below poverty level: 6%

III. Background: Approximately 1,200 "clandestine" or illegal drug labs are seized each year by law enforcement agencies. These labs, which manufacture the drug methamphetamine, typically use a variety of illegal and dangerous substances. The State and (to a lesser extent) the Federal government, provide support to law enforcement officials by removing the visible signs of these substances from the dwelling (often homes, apartments or motel rooms) where the lab operated. The "gross" contamination is then removed by qualified professionals and disposed according to the waste's characteristics. What remains in the dwelling is unknown; however, sufficient information exists to indicate that the permanent features of a dwelling, such as the wallboard, flooring, ventilation and septic systems may remain contaminated with substances which may continue to pose a risk to occupants. The majority of these illegal drug labs are located in communities where the residents do not have the financial resources or the political influence to effectively address this problem.

DTSC proposes to explore a number of possible approaches which could dramatically reduce exposure, especially to children, to possible remaining contaminants. Children are the focus of

this proposal because of their proximity to contaminated surfaces such as floor coverings, their prolonged duration of exposure, and children may be more sensitive to some of the remaining chemicals. Children who subsequently live in these dwellings may be exposed to chemicals such as ammonia, phosphine, hydrogen chloride, red phosphorous, methamphetamine and other caustic substances. These chemicals present a variety of potential health problems.

IV. Project Start Date: May 2005

V. Project End Date: December 2006

VI. Goal & Objectives:

a. Goal: Identify cost-effective approaches to reduce residual contamination from illegal drug labs which may be present in a dwelling after the "gross" contamination has been removed.

b. Objectives:

- Identify the extent of the remaining contamination to a specific number of contaminants associated with drug lab activity which may pose the greatest threat to children.
- Implement possible approaches to reduce or eliminate this potential exposure and test their effectiveness.
- Provide a written description of the most effective approach identified, including a step-by-step explanation of the materials and methods.
- Ensure statewide availability of this information via printed materials and the Internet.

VII. Activities – Planning, Implementation, Evaluation, & Deliverables

Planning

- Site Selection: DTSC examined its database of illegal drug lab removal activities and identified five cities (Antioch, Hayward, Oakland, Oakley, and San Jose) with the greatest number of seizures reported in the nine Bay Area counties. From this list, DTSC Public Participation staff considered which of these communities faced the greatest number of environmental challenges, the history of community activism and the current existence of organizations these communities to respond to environmental concerns.
- Reduction of Risk to Children's Health: It is likely that the greatest exposure to residual contamination in illegal drug labs is to children. Children are likely to come into contact with contaminated surfaces such as, carpeting, wall boards, and furniture, more often than adults. Children may spend a greater part of their day in the drug lab dwelling.

It is difficult to measure the actual health effects from these contaminants because there may be a number of other environmental factors, both inside and outside the home, that

also pose potential health risks. Thus, DTSC will measure the actual reduction in exposure to the specific contaminants identified.

- Cal/EPA Cross-Media Implication: Reducing contamination associated with direct contact to illegal and dangerous drug lab chemicals may lead to the ability to address other routes of exposure such as, inhalation through heating and cooling systems. Impacts to community waste-water treatment facilities contaminated through the drug lab structure sewage connections could also be explored. DTSC will work with other Cal/EPA Boards, Departments, and Office to identify cross-media opportunities as the project proceeds.
- Partnerships: DTSC will work collaboratively with the local Environmental Health Department and the County Medical Officer. Community support is critical to ensure building owner/tenant participation as well as acceptance and implementation of the project's recommendations.

Implementation

- Methodology & Performance Indicators: DTSC will develop an approach to analyze a finite number of contaminants at illegal drug labs. This activity will take place after the gross removal of contamination using state or federal resources. Based on this information, various approaches will be implemented and their effects measured to identify if a cost-effective means of reducing exposure to residual contamination remaining on solid surfaces exists.
- Public Participation: If approved, DTSC will conduct focused workshops in the five cities (Antioch, Hayward, Oakland, Oakley, and San Jose) with the greatest number of illegal drug lab seizures reported in the nine Bay Area counties. Community and local government participation will be requested. DTSC will select one out of the five communities based upon potential support expressed through the workshops for the project. The project plan will then be revised to reflect the focus of the selected community.

Project Work Plan & Timeline:

	Activity	Start Date	End Date
Phase 1	1. Identify pilot project location(s)	1 st Qtr 2005	1 st Qtr 2005
	2. Define project parameters	1 st Qtr 2005	1 st Qtr 2005
Phase 2	1. Collect project data	2 nd Qtr 2005	Ongoing
	2. Identify project data gaps	3rd Qtr 2005	4 th Qtr 2005
	3. Establish Local Advisory Groups (LAGs)	3 rd Qtr 2005	4 th Qtr 2005
Phase 3	1. Develop Children's Environmental Risk Reduction Plan (ChERRP)	4 th Qtr 2005	1 st Qtr 2006
Phase 4	1. Implement ChERRP	1 st Qtr 2006	1 st Qtr 2006
Phase 5	1. Evaluate ChERRP	3 rd Qtr 2006	4 th Qtr 2006
	2. Explore implementation options of project	4 th Qtr 2006	4 th Qtr 2006

Evaluation & Deliverables

- **Results**: While it is not possible within the timeframe of the project to demonstrate an improvement in the health of the community due to a reduction in exposure to contaminants associated with illegal drug labs, DTSC will then measure specific contaminant exposure reductions. The availability of this data along with the specific steps to achieve this reduction will be beneficial to the many other communities struggling with the presence of contaminated housing and other structures.
- **Deliverables:** This project should lead to two deliverables:
 - Identification of possible exposure to occupants from structures where clandestine drug activities have previously taken place; and
 - A cost-effective approach to reduce this exposure.
- Considerations, Anticipated Challenges/Constraints: Several states in the nation have attempted to develop standards for drug lab cleanups. These efforts have been extremely difficult and time consuming resulting in no known health-based standards. This project takes a different approach and views success as a significant reduction in exposure, rather than compliance with a cleanup level which has been established as health protective.

VIII. For More Information:

Comments, Questions, or Concerns regarding this Pilot?

Please direct comments, questions, or concerns to:

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